

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) JOSHUA FIELDS )  
Plaintiff, )  
v. ) Case No. 21-cv-00986-G  
(1) GREAT LAKES INSURANCE SE, ) *Removed from the District Court of*  
(2) MJ KELLY COMPANY, and ) *Kay County, State of*  
(3) CAPSTONE ISG, ) *Oklahoma, Case No. CJ-2021-00037*  
Defendants. )

**PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT GREAT LAKES  
INSURANCE SE'S MOTION IN LIMINE NO. 4 TO EXCLUDE EVIDENCE  
REGARDING PLAINTIFF'S "BAD FAITH" CLAIM**

SE's Motion in Limine No. 4. In support of this response, Plaintiff incorporates his response to Defendant's Motion for Summary Judgment [Dkt. No. 46] because Defendant sought summary judgment on Plaintiff's "bad faith" claim and this motion is simply another argument to exclude the cause of action. Plaintiff's motion for summary judgment response presents his objection and opposition to excluding the claim in his case and excluding evidence that supports his claim or "bad faith".

For these reasons, Plaintiff respectfully asks this Court overrule Defendant's Motion in Limine No. 4.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of November 2022, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants, via email:

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